

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	05 CR 10035 PBS
)	CRIMINAL NO.
v.)	
)	VIOLATION:
MARYSOL MORALES,)	
)	18 U.S.C. §666 (corrupt receipt of payments by agent of
defendant.)	federally funded local government entity)
)	

INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

1. At times pertinent to this Indictment, defendant MARYSOL MORALES was a resident of Brockton, Massachusetts and was employed by the Avon Housing Authority ("AHA") as manager of AHA's Section 8 rent subsidy voucher program.

2. At all times pertinent to this Indictment, the Avon Housing Authority ("AHA") was a local government agency that received benefits in excess of \$10,000 pursuant to the Section 8 rent subsidy voucher program of the United States Department of Housing and Urban Development.

3. At all times pertinent to this Indictment the United States Department of Housing and Urban Development ("HUD"), administered a rent subsidy program pursuant to Section 8 of the United States Housing Act of 1937, 42 U.S.C. § 1437f ("Section 8").

4. Under Section 8, people with low incomes obtain rental housing on the private market, subject to guidelines set by HUD. Based upon their income, participants in the program

pay a certain percentage of their income toward the rent, while the Section 8 money supplied by HUD pays the remainder of the rent directly to the landlord.

5. In administering the Section 8 program, local housing authorities such as AHA act as middlemen between HUD and the landlords who eventually receive the Section 8 monies. Money for the Section 8 program is wired from HUD in Washington, D.C., to the local housing authorities. The local housing authorities, in turn, issue checks to landlords, as rent payments for the beneficiaries of the program. The Section 8 subsidy program requires the local housing authorities, including AHA, to comply with HUD regulations in administering the Section 8 program.

6. At all times pertinent to this Indictment, there has been a shortage of Section 8 rental subsidy vouchers in Avon and elsewhere in Massachusetts; there have been more qualified applicants seeking Section 8 vouchers than there have been vouchers available. Accordingly, at the AHA and at other housing authorities in Massachusetts, income-eligible applicants seeking Section 8 vouchers have been placed on long wait lists for such vouchers.

7. As of August 2004, an individual who will be referred to in this indictment as J.M. had been on the AHA wait list for approximately 6 months.

8. As of August 2004, an individual who will be referred to in this indictment as B.O. had been on the AHA wait list for approximately 1 ½ years.

9. As of October 2004, an individual who will be referred to in this indictment as V.N. had been on the AHA wait list for approximately 2 years.

10. At no time pertinent to this Indictment has the AHA, or any of its agents or employees, been authorized to solicit or accept payments from applicants seeking Section 8 rental subsidies.

COUNT ONE

**(Corrupt Receipt of Payments by Agent of Federally Funded
Local Government Entity, in violation of 18 U.S.C. § 666)**

11. Paragraphs 1 through 10 are re-alleged and incorporated herein.

12. In or about August 2004, defendant MARYSOL MORALES arranged to meet J.M. at AHA's offices.

13. In or about August 2004, defendant MARYSOL MORALES informed J.M. that J.M. could receive a rental voucher more quickly if she paid a fee of \$2,600.

14. On or about September 17, 2004, defendant MARYSOL MORALES arranged for J.M. to come to the offices of the AHA where J.M. gave defendant MARYSOL MORALES \$2,600 in cash, and defendant MARYSOL MORALES gave J.M. a document that purported to be a voucher issued by the AHA.

15. On or about September 17, 2004, at Avon in the District of Massachusetts and elsewhere,

MARYSOL MORALES,

defendant herein, being an agent of the Avon Housing Authority, which was an agency of a state and local government that received, in the one year period from January 1, 2004 through December 31, 2004, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy and other form of Federal assistance, did corruptly solicit, demand, accept and agree to accept a thing of value from a person, the individual J.M., intending to be influenced or rewarded in connection with business, a transaction and a series of transactions of the Avon Housing Authority involving a thing of value of \$5,000 or more, namely a voucher for Section 8 rent subsidies.

All in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT TWO

**(Corrupt Receipt of Payments by Agent of Federally Funded
Local Government Entity, in violation of 18 U.S.C. § 666)**

16. Paragraphs 1 through 10 are re-alleged and incorporated herein.

17. In or about September August 2004, defendant MARYSOL MORALES arranged to meet B.O. at AHA's offices.

18. In or about August 2004, defendant MARYSOL MORALES informed B.O. that B.O. would have to pay \$6,000, to cover a security deposit, and first and last months rent and other charges, in order to receive her voucher.

19. On or about November 30, 2004, defendant MARYSOL MORALES arranged for B.O. to come to the offices of the AHA where B.O. gave defendant MARYSOL MORALES \$6,000 in cash, and defendant MARYSOL MORALES gave B.O. a document that purported to be a voucher issued by the AHA.

20. On or about November 30, 2004, at Avon in the District of Massachusetts and elsewhere,

MARYSOL MORALES,

defendant herein, being an agent of the Avon Housing Authority, which was an agency of a state and local government that received, in the one year period from January 1, 2004 through December 31, 2004, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy and other form of Federal assistance, did corruptly solicit, demand, accept and agree to accept a thing of value from a person, the individual B.O., intending to be influenced or rewarded in connection with business, a transaction and a series of transactions of the Avon Housing Authority involving a thing of value of \$5,000 or more, namely a voucher for Section 8 rent subsidies.

All in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT THREE

**(Corrupt Receipt of Payments by Agent of Federally Funded
Local Government Entity, in violation of 18 U.S.C. § 666)**

21. Paragraphs 1 through 10 are re-alleged and incorporated herein.

22. In or about September or October 2004, defendant MARYSOL MORALES contacted V.N. and informed V.N. that a voucher was now available to her.

23. In or about October 2004, defendant MARYSOL MORALES informed V.N. that V.N. would have to pay \$5,000, to cover a security deposit, and first and last months rent, in order to receive her voucher.

24. On or about November 30, 2004, defendant MARYSOL MORALES arranged for V.N. to come to the offices of the AHA where V.N. gave defendant MARYSOL MORALES \$5,000 in cash, and defendant MARYSOL MORALES gave V.N. a document that purported to be a voucher issued by the AHA.


25. On or about November 30, 2004, at Avon in the District of Massachusetts and elsewhere,

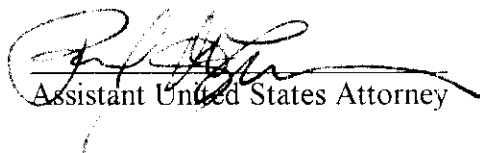
MARYSOL MORALES,

defendant herein, being an agent of the Avon Housing Authority, which was an agency of a state and local government that received, in the one year period from January 1, 2004 through December 31, 2004, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy and other form of Federal assistance, did corruptly solicit, demand, accept and agree to accept a thing of value from a person, the individual V.N., intending to be influenced or rewarded in connection with business, a transaction and a series of transactions of the Avon Housing Authority involving a thing of value of \$5,000 or more, namely a voucher for Section 8 rent subsidies.

All in violation of 18 U.S.C. § 666(a)(1)(B).

A TRUE BILL

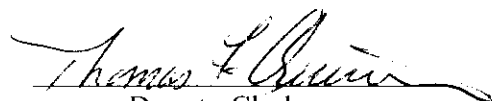

FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

February 11, 2005

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk
2/16/05 E 100pm

JS 45 (5/97) - (Revised USAO MA 1/15/04)

Criminal Case Cover Sheet **05 CR 10035 PBS** **U.S. District Court - District of Massachusetts**Place of Offense: Avon Category No. II Investigating Agency HUD-IGCity Avon Related Case Information:County Norfolk Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____**Defendant Information:**Defendant Name MARYSOL MORALES Juvenile ☐ Yes ☒ No

Alias Name _____

Address 144 Ford Street, Brockton, MA 02301Birth date (Year only): 1964 SSN (last 4 #): 5859 Sex F Race: Hispanic Nationality: USA

Defense Counsel if known: _____ Address: _____

Bar Number: _____

U.S. Attorney Information:AUSA Paul G. Levenson Bar Number if applicable 553946Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

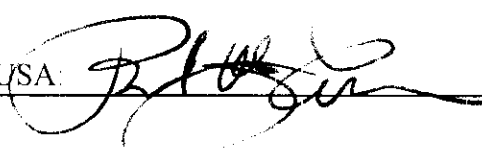
Arrest Date: _____

☐ Already in Federal Custody as _____ in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: February 16, 2005

Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant MARYSOL MORALES

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §666</u>	<u>Corrupt Receipt by Agent of Local Governemnt</u>	<u>1-3</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: